

Yolanda Huang (State Bar No. 104543)
LAW OFFICES OF YOLANDA HUANG
2748 Adeline Street, Suite A
Berkeley, California 94705
Telephone: (510) 329-2140
Facsimile: (510) 580-9410
E-Mail: yhuang.law@gmail.com

Thomas E. Nanney (State Bar No. 214342)
Law Office of Thomas E. Nanney
2217 W. 120th St.
Leawood, Kansas 66209
Telephone: (816) 401-0047
Email: tomnanney@gmail.com

Richard A. Brody, Esq. (State Bar No. 100379)
1206 Beattie Lane
Sebastopol, CA 95472
Telephone: (707) 235-6982
Facsimile: (707) 235-6982
Email: rick@brodylaw.com

Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO/OAKLAND DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass
PLAINTIFFS,

vs.

ALAMEDA COUNTY SHERIFF'S
OFFICE, et al

DEFENDANTS.

No. 3:19-cv-07423 JSC

PLAINTIFF ERIC GONZALEZ'
REQUEST FOR ENTRY ON LAND –
TO WIT – SANTA RITA JAIL

REQUEST ONE

Hon. Jacqueline S. Corley, Presiding

TO: Defendant ALAMEDA COUNTY SHERIFF'S OFFICE, through its attorney of record,
GREGORY B. THOMAS and TEMITAYO O. PETERS of BURKE, WILLIAMS & SORENSON, LLP.

PROPOUNDING PARTY Plaintiff Daniel Gonzalez serves this request for entry on land of Defendant Alameda County Sheriff's Office as authorized by Federal Rule of Civil Procedure 34(a)(2). Within 30 days after service of this request, Defendant ALAMEDA COUNTY SHERIFF'S OFFICE must respond by stating that inspection and related activities will be permitted or by making objections.

Entry on land is requested as follows:

Location: Santa Rita Jail, 5325 Broder Boulevard, Dublin, California.

Purpose: To view, inspect, document, and perhaps take samples of biological specimens from floors and walls in all common area showers from Housing Units 1,2, 9, 21, and a sample of the common area showers from Housing Units 3, 4, 6, 7 and 8, and the rooms used to stage inmates for court.

Date/Period of Time: November 9th through 16th, 2023. Plaintiff is flexible as to scheduling.

Attendees: Plaintiffs' counsels, Yolanda Huang, Richard Brody, Thomas Nanney, an expert witness, and a photographer.

Entry on land is necessary because plaintiffs have no other means of documenting the conditions of the shower and common areas in the men's housing units. Plaintiffs have requested that class members and plaintiffs be permitted to document these conditions themselves, including with the use of disposable, film cameras, which County defendants have refused.

Plaintiffs' counsel and their expert witnesses intend to photograph and videotape these conditions during this inspection, and where possible collect biological samples,

Dated: OCTOBER 8, 2023

LAW OFFICE OF YOLANDA HUANG

By: /s/ Yolanda Huang

YOLANDA HUANG

LAW OFFICE OF THOMAS E. NANNEY

By: /s/ Thomas E. Nanney

THOMAS E. NANNEY

RICHARD A. BRODY

By: /s/ Richard A. Brody

RICHARD A. BRODY

ATTORNEYS FOR PLAINTIFFS